

BEFORE THE IDAHO BOARD OF TAX APPEALS

IN THE MATTER OF THE APPEAL OF GRIFFIN S.) APPEAL NO. 06-A-2199
HERREN from the decision of the Board of Equalization) FINAL DECISION
of Elmore County for tax year 2006.) AND ORDER

MANUFACTURED HOME APPEAL

THIS MATTER came on for hearing November 1, 2006, in Mountain Home, Idaho, before Hearing Officer Steve Wallace. Board Members Lyle R. Cobbs and David E. Kinghorn participated in this decision. Appellant Griffin Herren appeared. Assessor Jo Gridley, Chief Appraiser Joell Soboslai, Prosecuting Attorney Kristian Schindele and Appraiser Michelle Boothe appeared for Respondent Elmore County. This appeal is taken from a decision of the Elmore County Board of Equalization denying the protest of the valuation for taxing purposes of property described as Parcel No. MHTR0000121700A.

The issue on appeal is the market value of a manufactured home.

The decision of the Elmore County Board of Equalization is affirmed.

FINDINGS OF FACT

The total assessed value is \$6,714. Appellant requests the value be reduced to \$3,419, or less.

Subject property is a 14 x 67 foot Marlette manufactured home built in 1974.

Appellant asserted subject's assessed value is excessive. The assessed value has had extreme fluctuations. In 2002 it was assessed for \$5,224; then as follows 2003 \$5,461; 2004 \$6,553; 2005 \$3,419 and then 2006 \$6,174. Appellant questioned how accurate the County's process was when there were large fluctuations in assessed values from year to year.

Appellant stated subject is substandard which may need to be considered in the assessed value.

Respondent mentioned that an offer was made to Appellant to discuss any substandard

conditions during a phone conversation and contended that Appellant declined the offer.

Respondent reported the assessed value increased due to changes in the local cost modifier and the market adjustments which are based on the previous year's sales.

Respondent's Exhibit 1, page 11 was a list of manufactured home sales that were considered by the Assessor when valuing subject:

Sale	Sale Date	Year Mfg.	Sale Price	2005 Assessed Value	2006 Assessed Value
SUBJECT		1974			\$ 6,714
Sale 1	11/06	1968	\$ 5,900	\$2,542	\$ 2,696
Sale 2	7/05	1965	\$ 1,500	\$ 987	\$ 1,069
Sale 3	3/05	1972	\$ 6,800	\$1,927	\$ 5,219
Sale 4	10/04	1972	\$ 9,000	\$3,324	\$ 7,400
Sale 5	9/05	1973	\$ 6,000	\$4,841	\$ 6,331
Sale 6	11/04	1972	\$ 4,900	\$2,032	\$ 5,333
Sale 7	8/05	1971	\$ 3,000	\$2,043	\$ 3,321
Sale 8	10/04	1974	\$11,000	\$8,936	\$13,169

The assessed values were compared to the sale prices of the manufactured homes, which indicated the assessed values were low.

An analysis of current costs for manufactured homes was submitted to demonstrate how the County arrived at a 130% local cost modifier. After arriving at the replacement cost to build a new manufactured home, the County made a negative adjustment to reflect the age and condition.

The Assessor agreed there are extreme fluctuations in manufactured home sales.

CONCLUSIONS OF LAW

This Board's goal in its hearings is the acquisition of sufficient, accurate evidence to

support a determination of fair market value. This Board, giving full opportunity for all arguments and having considered all testimony and documentary evidence submitted by the parties in support of their respective positions, hereby enters the following.

The issue in this appeal is the market value of a manufactured house. Appellant contends the assessed value is high.

Idaho is a market value state for property tax purposes.

Idaho Code § 63-201(10)

"Market value" means the amount of United States dollars or equivalent for which, in all probability, a property would exchange hands between a willing seller, under no compulsion to sell, and an informed, capable buyer, with a reasonable time allowed to consummate the sale, substantiated by a reasonable down or full cash payment.

The assessed value of property should be the most probable price it would sell for. The Assessor submitted eight sales of like manufactured homes to support the assessed value. The comparison sales approach is a recognized appraisal technique. Here the evidence indicates the subject property is assessed at current market. Sales or other market information was not furnished by Appellant to support the requested reduction in assessed value, nor was evidence presented to substantiate a substandard condition of subject.

This Board finds Appellant has not supported the claim for relief and therefore affirms the decision of the Elmore County Board of Equalization.

FINAL ORDER

In accordance with the foregoing Final Decision, IT IS ORDERED that the decision of the Elmore County Board of Equalization concerning the subject parcel be, and the same hereby is, affirmed.

DATED this 9th day of April, 2007.